

Annual 47 C.F.R. 64.2010 CPNI Certification

EB Docket 06-36

Annual 64.2009 (e) CPNI Certification for 2013

Date Filed: 2/6/14

Name of the company covered by this certification: ComTech21. LLC

Form 499 Filer ID: 821980

Name of signatory: Michael Brady

Title of signatory: EVP/CFO

I, Michael Brady, certify that I am an officer of the Company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. 64.2001 et seq*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed: _____

A handwritten signature in dark ink, appearing to read "M. Brady", is written over a horizontal line. The signature is stylized with a large, looped initial "M" and a trailing flourish.

Annual CPNI Compliance Certificate

Name of company covered by this certification: ComTech21, LLC

Date: February 6, 2014

I, Michael Brady, certify that I am an officer or agent of the company names above, and in my capacity have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Missouri Public Service Commission's CPNI rules of 4 CSR 240-33.160 (7).

- A. The company has implemented a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Calls to ComTech21 Customer Service:

Customers calling ComTech21, LLC customer service offices could discuss their services and billings with a ComTech21 representative, once that representative had verified the caller's identity. The verification was usually done through questions about account information know to ComTech21 and the customer or through verification methods such as social security numbers. This authentication practice will continue with respect to calls made to ComTech21, LLC customer service centers, as a general matter. However, ComTech21 will not be able to discuss call-detail information with an account holder unless the caller provides the call detail to the ComTech21 representative or has a pre-established password.

Online Access to Account Information:

ComTech21 provides online access to account information which requires a "Unique ID" at the time of setting up a new customer. Once the account is established they are provided a password to access their account. If at any time this password needs to change the customer is asked a "challenge question" prior to the change taking place.

- B. The company has implemented personnel training as to when they are and are not authorized to use CPNI including an express disciplinary process.

ComTech21 trains its employees on the limitations of use or disclosure of CPNI as governed by federal law and internal policy. ComTech21's policy, administered by its CPNI Compliance Manager (Laura Matosian, VP Operations), establishes the procedures and safeguards ComTech21's use and disclosure of CPNI policy is classified as Company Confidential and may be provided only to employees or to parties approved by the CPNI Compliance Manager.

ComTech21's disciplinary action may call for any of four steps-verbal warning, written warning, suspension with or without pay, or termination of employment-depending on the severity of the problem and the number of occurrences.

- C. The company maintains records for at least one year of their own, their agents' their affiliates', their joint venture partners' or their independent contractors' sales and marketing campaigns that use their customers' CPNI. Such records include a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as part of the campaign.

ComTech maintains a record, for a period of at least one year, of; those limited circumstances in which CPNI is disclosed to an outside collections agency.

- D. The company has a supervisory review process for outbound marketing situations.

ComTech21 does not currently use CPNI to market services.

- E. The company has procedures in place whereby the company will provide the Missouri Commission written notice within five business days of any instance where the opt-out mechanisms do not work properly, to such a degree that customers' inability to opt-out is more than an anomaly.

ComTech21 does not currently use CPNI to market services.

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- F. The company *has not* taken any actions against any individual or entity that unlawfully obtains, uses, discloses or sells CPNI.

- G. The company/ *has not* received any customer complaints in the past year concerning the unauthorized release of CPNI.

- H. The company (a) *does not* share CPN with joint venture partners or independent contractors (*except for billing and collections services*)

- I. **If the company chose option H (b):** The company does not enter into confidentiality agreements that comply with MoPSC rule 4 CSR 240-33.160(3)(A) 3 if the company shares CPNI with agents, affiliates, joint venture partners, or independent contractors.

Customer Proprietary Network Information

ComTech21, LLC Commitment to Safeguard Customer Information. ComTech21 has long been committed to the protection of customer privacy. In addition, we comply with federal laws regarding the protection of customer account information. Federal law characterizes this type of information as "Customer Proprietary Network Information" or CPNI. Here we refer to it simply as "account information." Account information includes information about a customer's services and their use of those services, as well as general billing information. It also includes information concerning specific calls, such as who was called, and the date and time of the call. Throughout this notice, we refer to call-related information "call-detail information."

Recent changes in rules by the Federal Communications Commission require carriers to implement stricter procedures to verify the identity of callers who want to discuss call-detail information or to engage in online transactions that would allow access to account information generally.

New Rules for Access to CPNI.

Calls to ComTech21 Customer Service:

In the past, customers calling ComTech21, LLC customer service offices could discuss their services and billings with a ComTech21 representative, once that representative had verified the caller's identity. The verification was usually done through questions about account information known to ComTech21 and the customer or through verification methods such as social security number. This authentication practice will continue with respect to calls made to ComTech21, LLC customer service centers, as a general matter. However, ComTech21 will not be able to discuss call-detail information with an account holder *unless* the caller provides the call detail to the ComTech21 representative or has a pre-established password.

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Notifications of Certain Account Changes.

In addition to changes outlined above regarding access account information, ComTech21 will be notifying customers of certain account *changes*. For example, whenever an online account is created or changed, or a password or other form of authentication (such as a "secret question and answer") is created or changed, ComTech21 will notify the account holder. Additionally, after an account has been established, when a customer's address (whether postal or e-mail) changes or is added to an account, ComTech21 will send a notification. These notifications may be sent to a postal or e-mail address, or by telephone, voicemail or text message.

Business Relationships and Exemption From the Rules. ComTech21, LLC practices with respect to CPNI access and required notifications will essentially be the same for our residential and small business customers.

But in cases where ComTech21 and a business have a contractual relationship, and the business has access to a dedicated account representative, the authentication processes used by the parties may be different and notifications might not be sent. In these cases, ComTech21 will verify a person's authority to discuss account information through communications with the person claiming to represent the account holder. And in situations where a customer seeks online access to account information, an access code will be required.

In some cases, ComTech21 and the business will have a formal written agreement that will contain a confidentiality provision. In other cases, the contractual relationship will be based on purchases made by the customer from a ComTech21 tariff or Rate and Service Schedule (RSS), or on the words and conduct of the parties. The relationship will reflect ComTech21, LLC long-standing protection of customer account information and our practices of not using or disclosing such information except to provide services or as permitted or required by law.

Questions or Comments. ComTech21 takes seriously our obligation to protect customer information. Our compliance with the rules recently enacted by the FCC is a continuation of our long-standing practice. If you have questions about this notice or about our specific commitment to the protection of your information, please contact us at salesupport@comtech21.com